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File No. 404600.000869

November 9, 2023

DELIVERED VIA EMAIL AND COURIER

SEE SERVICE LIST

Dear Sirs/Mesdames:

Re: Royal Bank of Canada (“RBC”) v BRM Canada Group Inc. (“BRM”) et al, Court of King’s Bench of Alberta File No. 2301-01408 (the “Action”)

Application Date: December 19, 2023 at 11:00 AM (Via WebEx Video Conference)

We are counsel to the Plaintiff, RBC, in respect of the above-referenced Action.

We write to inform you that an application has been scheduled for December 19, 2023, at 11:00 a.m. before the Honourable Justice Feasby, wherein RBC will seek to appoint a receiver and manager in respect of certain real property owned by BRM.

In this regard, please find attached, for service upon you, the following materials:

1. the Application for Appointment of Receiver (including the proposed form of Receivership Order);
2. the Affidavit of Value sworn by Chris Chornohos on November 7, 2023;
3. the Affidavit of Jessica Chohan sworn on November 8, 2023;
4. the Consent to Act of the proposed Receiver; and
5. blacklines illustrating comparisons of the proposed form of Receivership Order to the Alberta Template Receivership Order.

Virtual Courtroom 60 has been assigned for the above-noted matter. Please see the dial-in details below to attend the hearing via WebEx:

Virtual Courtroom Link: <https://albertacourts.webex.com/meet/virtual.courtroom60>

Instructions for Connecting to the Meeting

1. *Click on the link above or open up Chrome or Firefox and cut and paste it into your browser address bar.*
2. *If you do not have the Cisco Webex application already installed on your device, the site will have a button to install it. Follow installation instructions. Enter your full name and email address when prompted.*

3. Click on the **Open Cisco Webex Meeting**.
4. You will see a preview screen. Click on **Join Meeting**.

Key Considerations for Those Attending

1. Please connect to the courtroom **15 minutes prior** to the start of the hearing.
2. Please ensure that your microphone is muted and remains muted for the duration of the proceeding, unless you are speaking. Ensure that you state your name each time you speak.
3. If bandwidth becomes an issue, some participants may be asked to turn off their video and participate by audio only.
4. **Note: Recording or rebroadcasting of the video is prohibited.**
5. **Note: It is highly recommended you use headphones with a microphone or a headset when using Webex. This prevents feedback.**

If you are a non-lawyer attending this hearing remotely, you must complete the undertaking located here: <https://www.albertacourts.ca/qb/resources/announcements/undertaking-and-agreement-for-non-lawyers>

For more information relating to Webex protocols and procedures, please visit: <https://www.albertacourts.ca/qb/court-operations-schedules/webex-remote-hearings-protocol>


You can also join the meeting via the “Cisco Webex Meetings” App on your smartphone/tablet or other smart device. You can download this via the App marketplace and join via the link provided above.

**

Should you have any questions or concerns, please contact our office.

Yours truly,

BORDEN LADNER GERVAIS LLP



Jack R. Maslen
Enclosures

cc: Tiffany Bennett, Borden Ladner Gervais LLP – via Email (tibennett@blg.com)

COURT FILE NUMBER **2301-01408**

COURT COURT OF KING'S BENCH OF ALBERTA

JUDICIAL CENTRE CALGARY

PLAINTIFF/
APPLICANT ROYAL BANK OF CANADA

DEFENDANTS/
RESPONDENTS BRM CANADA GROUP INC., SAIMA QADEER
and CHOUDHRY QADEER AKRAM

DOCUMENT SERVICE LIST

RECIPIENT	RECIPIENT STATUS	SENT BY
Royal Bank of Canada 5th Floor, 335 - 8 Avenue SW Calgary, AB T2P 1C9 Attention: Jessica Chohan jessica.chohan@rbc.com	Plaintiff/Applicant	<i>Email</i>
Borden Ladner Gervais LLP 1900, 520 – 3 Avenue SW Calgary, AB T2P 0R3 Attention: Jack Maslen JMaslen@blg.com Tiffany Bennet TiBennett@blg.com	Counsel to the Plaintiff/ Applicant, Royal Bank of Canada	<i>Email</i>
Reliance Legal Group LLP Commonwealth Centre Unit 1101, 3961 – 52 Avenue NE Calgary, AB T3J 0J7 Attention: Taylor L. Johnson tj@rlglaw.ca	Counsel to the Defendants/ Respondents, BRM Canada Group Inc., Saima Qadeer, and Choudhry Qadeer Akram	<i>Email</i>

<p>KPMG Inc. 3100, 205 - 5 Avenue SW Calgary, AB T2R 0E1</p> <p>Attention: Neil Honess neilhoness@kpmg.ca</p> <p>Jacqueline Shellon jshellon@kpmg.ca</p> <p>Joe Sithole jsithole@kpmg.ca</p>	<p>Proposed Receiver and Manager of BRM Canada Group Inc.</p>	<p><i>Email</i></p>
<p>Cassels Brock & Blackwell LLP 3810, 888 – 3 Street SW Calgary, AB T2P 5C5</p> <p>Attention: Jeffery Oliver joliver@cassels.com</p> <p>Danielle Maréchal dmarechal@cassels.com</p>	<p>Counsel to the Proposed Receiver and Manager of BRM Canada Group Inc.</p>	<p><i>Email</i></p>
<p>APNA – Punjab Grocery & Movies & Gifts Corp. 120 Saddlecrest Gardens NE Calgary, AB T3J 0C3</p>	<p>Caveator</p>	<p><i>Courier</i></p>
<p>Canada Revenue Agency Department of Justice Canada Prairie Regional Office – Edmonton 300, 10423 – 101 Street NW Edmonton, AB T5H 0E7</p> <p>Attention: George Body George.Body@justice.gc.ca</p> <p>Marlene Barrientos Marlene.Barrientos@justice.gc.ca</p>	<p>Counsel for Canada Revenue Agency</p>	<p><i>Email / Courier</i></p>
<p>Canada Revenue Agency 220 – 4 Avenue SE Calgary, AB T2G 0L1</p>		<p><i>Courier</i></p>
<p>Canada Revenue Agency Surrey National Verification and Collections Centre 9755 King George Boulevard Surrey, BC V3T 5E1</p>		<p><i>Courier</i></p>

<p>Alberta Finance & Treasury Legal Team Legal Services Division 2nd Floor, Peace Hills Trust 10011 – 109 Street Edmonton, AB T5J 3S8</p> <p>Attention: Scott Chen Scott.Chen@gov.ab.ca</p> <p>Rachelle Sorgiovanni Rachelle.Sorgiovanni@gov.ab.ca</p>	<p>Government of Alberta</p>	<p><i>Email / Courier</i></p>
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<p>City of Calgary PO Box 2100, Stn Main Calgary, AB T2P 2M5</p>		<p><i>Registered Mail</i></p>